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8 Attorneys for McKinsey Defendants
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13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
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16 IN RE: MCKINSEY & CO., INC. NATIONAL) Case No. 3:21-md-02996-CRB
17 PRESCRIPTION OPIATE CONSULTANT)
18 LITIGATION)
19 This Document Relates to:) **STIPULATION AND [PROPOSED]**
20 All School District Cases) **SETTLEMENT APPROVAL SCHEDULE**
21 All Subdivision Cases) **AND NOTICE PROCESSES**
22 All Third Party Payor Cases)
23 All Tribal Cases)
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1 Pursuant to the Joint Status Report (ECF No. 562), the Parties propose this Settlement
2 Approval Schedule and Notice Processes for the School District, Subdivision, Tribal, and Third
3 Party Payor (TPP) Plaintiffs.

4 **For the School District, Subdivision, and Third Party Payor Plaintiffs:**

5 For the School District and Subdivision proposed class action settlements, the parties to
6 each are drafting settlement agreements, class notices, and notice programs, and will file their
7 respective motions for preliminary approval under Rule 23(e) no later than August 31, 2023, with
8 hearing thereon to be set by the Court.

9 For the TPP proposed class action settlement, TPP plaintiffs are drafting the settlement
10 agreement, class notice, and notice program, and will file their motion for preliminary approval
11 under Rule 23(e) no later than September 15, 2023, with the hearing thereon to be set by the Court.

12 These dates may be reasonably extended by the parties if necessary to finalize the
13 settlements, with notice to the Court of any such extensions.

14 **For Tribal Plaintiffs:**

15 The Tribal settlement is a non-class, opt-in settlement that generally follows the process
16 developed in the previous Tribal settlements in MDL 2804. The Tribal settlement agreement and
17 participation forms are being finalized, and the participation process is expected to commence
18 shortly. The parties will provide further information on the progress of this settlement by August
19 31, 2023.

20 Respectfully submitted,

21 Dated: July 27, 2023

22 LIEEFF CABRASER HEIMANN & BERNSTEIN, LLP
ELIZABETH J. CABRASER

23 By: /s/ Elizabeth J. Cabraser
Elizabeth J. Cabraser

25 Plaintiffs' Lead Counsel

1 STROOCK & STROOCK & LAVAN LLP
2 JAMES L. BERNARD

3 By: /s/ James L. Bernard
4 James L. Bernard

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6 Attorneys for Defendants

7 **IT IS SO ORDERED.**

8 DATED: July 28, 2023

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CHARLES R. BREYER
United States District Judge